

MARQUIS AURBACH COFFING

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

**Marquis Aurbach**  
Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
ncrosby@maclaw.com  
*Attorneys for Defendants, LVMPD,  
Joseph Lombardo, John Pelletier, Richard Maupin,  
Ryan Fryman, Juan Contreras, Allen Pavese and  
Brandon Meads*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

NEBYOU SOLOMON, an individual,  
Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT; JOSEPH LOMBARDO,  
individually and in his official capacity as  
Sheriff; JOHN L. PELLETIER, an individual;  
RICHARD E. MAUPIN, an individual;  
RYAN J. FRYMAN, an individual; JUAN D.  
CONTRERAS, an individual; ALLEN J.  
PAVESE, an individual; BRANDON M.  
MEADS, an individual; FASHION SHOW  
MALL, LLC, a Nevada limited-liability  
company; UNIVERSAL PROTECTION  
SERVICE, LLC, a Nevada limited-liability  
company; ANDREW ANTONIO, an  
individual, EDUARDO AGUILAR, an  
individual, DOES I-V, individuals,

Defendants.

Case Number: 2:19-cv-00652-JAD-CWH

**STIPULATION AND ORDER TO  
EXTEND LVMPD DEFENDANTS'  
DEADLINE TO FILE REPLY TO  
DISPOSITIVE MOTION**

**(FIRST REQUEST)**

ECF No. 131

Defendants, the Las Vegas Metropolitan Police Department (the "Department" or  
"LVMPD"), Joseph Lombardo ("Lombardo"), John Pelletier ("Pelletier"), Richard Maupin  
("Maupin"), Ryan Fryman ("Fryman"), Juan Contreras ("Contreras"), Allen Pavese  
("Pavese"), and Brandon Meads ("Meads") (collectively "LVMPD Defendants"), by and  
through their counsel of record, Nick D. Crosby, Esq., of the law firm of Marquis Aurbach;

MARQUIS AURBACH COFFING

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

1 and Plaintiff Nebyou Solomon ("Solomon"), by and through his counsel of record, Margaret  
2 A. McLetchie, Esq., and Leo S. Wolpert, Esq., of McLetchie Law, hereby stipulates and  
3 requests the following:

4 1. The Parties hereby agree and stipulate that LVMPD Defendants shall have an  
5 additional fourteen (14) days in which to file their Reply in Support of LVMPD Defendants'  
6 Motion for Summary Judgment (ECF No. 118).

7 2. Plaintiff's Response in Opposition (ECF No. 128) to LVMPD Defendants'  
8 Motion for Summary Judgment was filed on January 5, 2022.

9 3. The current Reply deadline is January 19, 2022 and the requested extension  
10 would make the new deadline February 2, 2022.

11 4. This extension of time is necessary to ensure concise and appropriate briefing  
12 which will increase the likelihood that the case is decided on its merits rather than on a  
13 technicality.

14 5. Counsel for the Defendants was in a labor arbitration which occupied a  
15 significant amount of time and resources to prepare for and was out of the jurisdiction for  
16 personal medical reasons related to a family member.

17 6. This request for additional time is to ensure proper representation of the  
18 Parties' interests and quality briefing.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

7. This request is made in good faith and is not sought for any improper purpose or for the purpose of delay.

Dated this 20th day of January, 2022.

Dated this 20th day of January, 2022.

**MARQUIS AURBACH**

**MCLETCHIE LAW**

By: /s/ Nick D. Crosby, Esq.

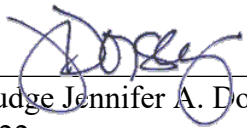
By: /s/ Margaret A. McLetchie, Esq.

Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
*Attorneys for LVMPD Defendants*

Margaret A. McLetchie, Esq.  
Nevada Bar No. 10931  
Leo S. Wolpert, Esq.  
Nevada Bar No. 12658  
602 South Tenth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

**ORDER**

IT IS SO ORDERED:

  
\_\_\_\_\_  
U.S. District Judge Jennifer A. Dorsey  
January 24, 2022  
*nunc pro tunc to January 19, 2022*

**MARQUIS AURBACH COFFING**

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816